

**Exhibit A**  
**Supplemental Affidavit of**  
**Lieutenant Cory Welch**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA**

**EDWIN D. DENNIS, JR.,**

**Plaintiff,**

**v.**

**COREY WELCH, et.al**

**Defendant.**

**Civil Action No. 3:05-CV-919-T**

**SUPPLEMENTAL AFFIDAVIT OF COREY WELCH**

**STATE OF ALABAMA**

**COUNTY OF LEE**

**BEFORE ME**, the undersigned authority and Notary Public in and for said County and State at large, personally appeared **COREY WELCH**, who being known to me and being by me first duly sworn on oath deposes and says as follows:

1. My name is Corey Welch. I am over the age of nineteen and competent to execute this affidavit.
2. All persons being booked into the Lee County Detention Center are given the opportunity to complete an Enemies List.
3. The Booking Officer gives the arrestee an opportunity to make known in writing any person within the Detention Center whom he fears or has reason to believe is a threat to him in any way.
4. If the inmate states that there is an inmate or inmates that would do him harm, Detention Center personnel will list the inmate or inmates on the Enemies List form stating the reason the new inmate feels that he is in danger.
5. Whenever such a situation occurs, the Shift Supervisor will be notified and the

new inmate will be housed away from those who he fears will cause him harm.

6. In addition, at any time, an inmate may activate the buzzer in the cell or otherwise alert any officer and orally request to be moved to a different cell if that inmate feels that he is in danger of an attack. All Detention Center staff understands that an inmate's oral or written request to be moved where the inmate feels threatened is to be taken seriously. If such a request is made, that inmate is moved *immediately*. An inmate, however, cannot choose which cell he or any other inmates are assigned to based on which inmates they like or dislike.

7. All inmates are provided access to a Los Angeles County Detention Center Inmate Handbook. A copy of this handbook is placed in each cellblock for inmates to review whenever they wish. The following is an excerpt from that handbook:

**SECTION 16: GRIEVANCES**

- 16.1 If you have a grievance, you can report it on an Inmate Request form. Only one signature is allowed on a grievance.
- 16.2 Your grievance will be investigated and answered, in writing, within 72 hours of the time it is received, excluding weekends and holidays. Grievances are first answered by the appropriate staff at the lowest level in the chain of command.
- 16.3 If you are not satisfied with the first answer to your grievance, you may send a grievance to the next higher command level (attach a copy of the first grievance). You may continue to send it through the chain of command, up to the Sheriff, who will make the final decision.
- 16.4 We will not take any negative action against you because you file a grievance.

8. Copies of all request forms, including grievance request forms, are placed in the inmate's "Inmate File."


9. There are no request forms or grievances in the Plaintiff's inmate file regarding the allegations made the basis of the Plaintiff's Complaint.

10. There are several request forms regarding various other issues in the Plaintiff's inmate file. Therefore, it is clear that the Plaintiff was able to file request forms.


11. I have complied with all policies and procedures of the Lee County Detention Facility. I am not aware of nor have I authorized or allowed any deviation from said policies and procedures.

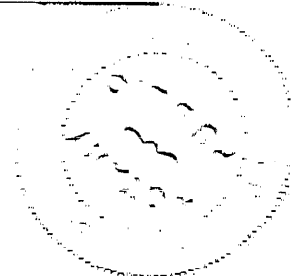
12. I certify and state that the documents from Inmate Files provided to the Court are true and correct copies of inmate records, kept at the Lee County Jail in the regular course of business. I am one of Custodian of these Records.

13. I swear, to the best of my present knowledge and information that the above statements are true, that I am competent to make this affidavit and that the above statements were made by drawing from my personal knowledge of the situation.

  
Corey Welch

SWORN TO and SUBSCRIBED before me this 1st day of February, 2006.

  
NOTARY PUBLIC My Commission Expires FEB. 10, 2007



**Exhibit B**  
**Supplemental Affidavit of**  
**Sergeant Tommy Threat**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA**

**EDWIN D. DENNIS, JR.,**

**Plaintiff,**

**v.**

**Civil Action No. 3:05-CV-919-T**

**TOMMY THREAT, et.al**

**Defendant.**

**SUPPLEMENTAL AFFIDAVIT OF TOMMY THREAT**

**STATE OF ALABAMA**

**COUNTY OF LEE**

**BEFORE ME, the undersigned authority and Notary Public in and for said County and State at large, personally appeared TOMMY THREAT, who being known to me and being by me first duly sworn on oath deposes and says as follows:**

1. My name is Tommy Threat. I am over the age of nineteen and competent to execute this affidavit.
2. All persons being booked into the Lee County Detention Center are given the opportunity to complete an Enemies List.
3. The Booking Officer gives the arrestee an opportunity to make known in writing any person within the Detention Center whom he fears or has reason to believe is a threat to him in any way.
4. If the inmate states that there is an inmate or inmates that would do him harm, Detention Center personnel will list the inmate or inmates on the Enemies List form stating the reason the new inmate feels that he is in danger.
5. Whenever such a situation occurs, the Shift Supervisor will be notified and the new inmate will be housed away from those who he fears will cause him harm.

6. In addition, at any time, an inmate may activate the buzzer in the cell or otherwise alert any officer and orally request to be moved to a different cell if that inmate feels that he is in danger of an attack. All Detention Center staff understands that an inmate's oral or written request to be moved where the inmate feels threatened is to be taken seriously. If such a request is made, that inmate is moved *immediately*. An inmate, however, cannot choose which cell he or any other inmates are assigned to based on which inmates they like or dislike.

7. The Plaintiff did not request to be moved; on the contrary, he requested for another inmate to be kicked out of his cell. The Plaintiff and two other inmates, Walter Smith and Johnathan Revells, had turned in a statement wherein they asked that Teddy Houston be moved out of their cell. Therefore, I went to investigate to determine why they wanted Houston moved. After questioning the inmates, it was clear that Teddy Houston did not pose a threat or danger to the inmates. Instead, the Plaintiff and the other two inmates simply did not like Houston and wanted to kick him out of the cell. The Plaintiff was given the opportunity to advise me if there was any threat or danger posed by Houston; however, the Plaintiff did not advise me of such. Because there was no concern of threat or danger voiced, no action was taken.

8. All inmates are provided access to a Lee County Detention Center Inmate Handbook. A copy of this handbook is placed in each cellblock for inmates to review whenever they wish. The following is an excerpt from that handbook:

**SECTION 16: GRIEVANCES**

- 16.1 If you have a grievance, you can report it on an Inmate Request form. Only one signature is allowed on a grievance.

16.2 Your grievance will be investigated and answered, in writing, within 72 hours of the time it is received, excluding weekends and holidays. Grievances are first answered by the appropriate staff at the lowest level in the chain of command.

16.3 If you are not satisfied with the first answer to your grievance, you may send a grievance to the next higher command level (attach a copy of the first grievance). You may continue to send it through the chain of command, up to the Sheriff, who will make the final decision.

16.4 We will not take any negative action against you because you file a grievance.

9. Copies of all request forms, including grievance request forms, are placed in the inmate's "Inmate File."

10. There are no request forms or grievances in the Plaintiff's inmate file regarding the allegations made the basis of the Plaintiff's Complaint.

11. There are several request forms regarding various other issues in the Plaintiff's inmate file. Therefore, it is clear that the Plaintiff was able to file request forms.

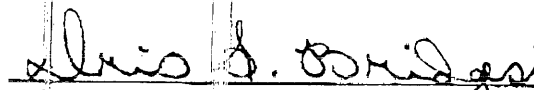
12. I have complied with all policies and procedures of the Lee County Detention Facility. I am not aware of nor have I authorized or allowed any deviation from said policies and procedures.

13. I swear, to the best of my present knowledge and information that the above statements are true, that I am competent to make this affidavit and that the above statements were made by drawing from my personal knowledge of the situation.



Tommy Threat

SWORN TO and SUBSCRIBED before me this 2 day of <sup>march</sup>~~February~~, 2006.



NOTARY PUBLIC

My Commission Expires: \_\_\_\_\_